



Police, Fire and Crime Commissioner for Essex

Equality, Diversity and Inclusion Strategy

Document information		
Version Control	Version 3	April 2021
Reviewed by	External review	May 2020
Reviewed by	D Horsman	April 2021
Policy Owner	P Brent-Isherwood	June 2020
First Published	J Drewett	22 November 2012
Next Review Date	D Horsman	April 2023

Version history

Version Number	Date	Reason for review	Comments
1.0	November 2012		First publication
1.1	March 2013		Update
1.1	April 2016	Policy update	No changes required
2	April 2020	Policy update	Significant revision, inclusion of new objectives and rewritten throughout.
3	April 2021	EDI Objective update	Following review at SMT, agreed to split first EDI objective on governance.

Contents

Introduction

The Equality Act 2010 and the Public Sector Equality Duty

- Public Sector Equality Duty Aims (General Duty)
- Protected Characteristics
- Positive action
- Types of discrimination
- Public Sector Equality Duty Aims (Specific duties)
- Implementation

Holding the Chief Officers to the Account

What does this mean for the Police, Fire and Crime Commissioner?

How we will do this?

- Our Equality Objectives 2021
- Equality analysis
- Making relevant information accessible
- Monitoring recruitment and appointment of staff
- Monitoring Essex Police and Essex County Fire and Rescue Service

How can I find out more information or give feedback on this Equality Scheme?

Appendix A – Equality impact form

Introduction

The Police, Fire and Crime Commissioner (PFCC) for Essex is responsible for securing and maintaining an efficient and effective police service for the people of Essex and since October 2017 has also been responsible for Essex County Fire and Rescue Service (ECFRS) as the Police, Fire and Crime Commissioner Fire and Rescue Authority (PFCCFRA). More information about the role of the PFCC regarding policing and crime can be viewed [here](#) and about fire and rescue [here](#). Both constitutions are available on the Police, Fire and Crime Commissioner's website at www.essex.pfcc.police.uk. Both [Essex Police](#) and [ECFRS](#) have their own approach to delivering against their own public sector equality duty. Essex Police through their Equality, Diversity and Inclusion Strategy and in the case of Essex County Fire and Rescue Service through integration of equality, diversity and inclusion elements into their service strategies.

The PFCC's vision is to create safe and secure communities which are the bedrock on which we build success and wellbeing for all. Embedded in this vision is a need to work with, alongside and for local communities and at its heart this vision relies on the successful implementation of the three general aims of the Public Sector Equality Duty.

This vision is set out clearly within both the Police and Crime Plan 2016-2020 (now extended to 2021) and the Fire and Rescue Plan 2019-2024 and is well integrated into the work of both services. This clear strategic focus has helped both services to attract a more diverse workforce and better reflect local communities, improving the services provided and increasing the confidence those diverse communities have. Beyond this both services are also working hard on making their own contribution to eliminating discrimination, achieving equality of opportunity and fostering good relations within our communities.

This strategy sets out the equality, diversity and inclusion objectives the Police, Fire and Crime Commissioner will undertake to support this vision for Essex and how these will be implemented and measured.

Our Equality Objectives 2021

While these equality objectives statutorily only need to be reviewed every four years, they will be reviewed once every two years, or before if necessary, and be reported on annually. The progress made against these objectives will be published on the Police, Fire and Crime Commissioner's website.

Governance

- Scrutinise the work of Essex Police against its obligations in the Equality Act 2010 and their own equality objectives. This will include a focus on Stop and Search activity and involve direct scrutiny and scrutiny through our members of partnerships boards such as Health and Wellbeing Boards and Safer Essex.
 - Through our Performance and Resources Board undertake a twice-yearly in-depth scrutiny session on the performance of the service and how it is delivering against its Public Sector Equality Duty. The notes from these sessions will be published and accessible to the public.
 - Actively participate in the force's own internal governance arrangements.
- Scrutinise the work of Essex County Fire and Rescue Service (ECFRS) against its obligations in the Equality Act 2010 and its own equality objectives. This will include performance against the external benchmarking.
 - Develop a broad scrutiny programme to ensure effective scrutiny of ECFRS work in the area including, but not limited to, twice yearly in-depth scrutiny sessions at the Performance and Resource Board focused on the performance of the service and how it is delivering against the Public Sector Equality Duty. Ensure that the notes from these are published and accessible to the public.

Engagement

- Improve our understanding and connection with communities so everyone has equal opportunity to express their views on policing and fire and rescue services in Essex.
 - By June each year publish an engagement plan that identifies the different communities within Essex and sets out how we will reach out to them through our engagement programme. This Plan will be published along with a full list of all public engagement activity.
 - Develop and deliver engagement programmes that provide the opportunity for all people across Essex to provide their input in key strategic documents, including the Police and Crime Plan, and Fire and Rescue Plan. To provide a particular focus on engagement with young people and people from BAME communities.

Decision Making

- Ensure that key strategic decisions consider the three aims of the Public Sector Equality Duty and provide clear evidence of what has been considered and contributed to the final decision. Where necessary undertake a full Equality Impact Assessment.

- All decision sheets that set out the basis for decisions taken by the Police, Fire and Crime Commissioner will consider the three aims and how the decision contributes to achieving them; the people the decision will affect, and whether this effect will disproportionately impact any group with a protected characteristic.
- Where a disproportionate impact is identified, a full Equality Impact Assessment will be completed.

Service delivery

- Monitor the effectiveness of our commissioned services in reaching all protected groups and how they are proactively supporting the three objectives within the Equality Act 2010.
 - Report on how commissioned services are delivering against the three aims of the Public Sector Equality Duty. Where necessary incorporate these reporting requirements into the contract for the service either by altering the contract part way through or incorporating into the next scheduled renewal of the contract.

The Equality Act 2010 and the Public Sector Equality Duty

To achieve the Police, Fire and Crime Commissioner's vision for Essex it is important that all communities and people within Essex work well together, share an equality of opportunity and that discrimination, harassment and victimisation are eliminated wherever possible. This puts equality, diversity and inclusion at the very heart of the work the Police, Fire and Crime Commissioner does.

As a public authority, the PFCC also has a legal duty, the Public Sector Equality Duty, to support the aims of the Equality Act 2010 ("the Act"). This is a duty on public bodies and others carrying out public functions. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, in delivering services, and in relation to their own employees.

The Duty supports good decision making – it encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of our activities on different people, and how inclusive public services can support and create opportunities for our communities, public bodies are better placed to deliver policies and services that are efficient and effective.

Public Sector Equality Duty Aims (General Duty)

The general equality duty is set out in the Equality Act 2010. Those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act. This is the only element of the Act that applies to marriage and civil partnerships.
- Advance equality of opportunity between people who share one or more protected characteristics and those who do not. This includes removing or minimising disadvantages suffered by people due to their protected characteristics, meeting the needs of people from protected groups and encouraging people with protected characteristics to participate in public life or in other activities where participation is low.
- Foster good relations between people who share one or more protected characteristics and those who do not. This involves tackling prejudice and promoting understanding between people from different groups.

Compliance with the duty may involve treating some people differently to others. Due regard requires the PFCC to consider the general equality duty when making decisions so that equality issues influence the outcome, whether about the PFCC's role as an employer, the development, evaluation and review of policies, or the design, delivery and evaluation of services.

The PFCC undertakes Equality Impact Assessments on policies and procedures, at a formative stage as a matter of good practice. The analysis carried out provides a means of considering the effect on protected groups and identifying practical steps to tackle any negative effects or discrimination. Any mitigating actions that have been identified will be monitored. The process is also an opportunity to identify ways to advance equality and foster good relations.

Protected Characteristics

The Act covers individuals grouped together by their '**protected characteristics**'. The protected characteristics set out in the Act are:

- a) **Age** - The act protects people of all ages however, different treatment because of age is not unlawful if it can be justified. Compulsory retirement at any age is unlawful unless objectively justified.
- b) **Disability** - It is discrimination to treat a disabled person less favourably because of something connected with their disability. This discrimination is unlawful where the employer knows the person has a disability. It is only justifiable if the employer can show that it is a proportionate means of achieving a legitimate aim.
- c) **Sex** - Both men and women are protected under the Act.
- d) **Race** - For the purpose of the Act 'race' includes colour, nationality and ethnic or national origins. A racial group can be made up of two or more different racial groups.
- e) **Religion or belief** - Religion includes any religion or lack of religion. A religion must have a clear structure and belief. To be protected a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief.
- f) **Sexual orientation** - The Act protects bisexual, gay, heterosexual, lesbian, transgender and non-binary people.
- g) **Gender reassignment** - The Act provides protection for transsexual people, defined as someone who is proposing to undergo, is undergoing or has undergone a process to change their gender. A person is not required to be under medical supervision to be protected.
- h) **Pregnancy and maternity** - A woman is protected against discrimination during the period of her pregnancy and any statutory maternity leave to which she is entitled. An employee's period of absence due to pregnancy related illness must not be taken into account when making a decision about her employment e.g. redundancy.
- i) **Marriage and civil partnership** (not covered for all aspects of the duty) - The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected.

Positive action

Positive action provisions enable public sector organisations to take proportionate steps to help those with protected characteristics who may be disadvantaged or underrepresented to overcome their disadvantages or to meet their needs.

There is no requirement to take positive action and there is no restriction on treating disabled people more favourably than non-disabled people.

Types of discrimination

The Equality Act protects employees from seven different types of discrimination:

- a) **Direct discrimination** - Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have or because of their association with someone who has a protected characteristic.
- b) **Associative discrimination** - This is direct discrimination against someone because they associate with another person who has a protected characteristic. This applies to race, religion or belief and sexual orientation, age, sex, disability and gender reassignment.
- c) **Perceptive discrimination** - Perceptive discrimination is direct discrimination against an individual because others think they have a particular protected characteristic. This applies even if the person does not actually possess that characteristic.

Perceptive discrimination applies to age, race, religion or belief and sexual orientation, disability, gender reassignment and gender.

- d) **Indirect discrimination** - Indirect discrimination can occur when there is a condition, rule, policy or practice that applies to everyone, but particularly disadvantages people who share a protected characteristic. Indirect discrimination *can* be justified if it can be shown that the action is reasonable business management i.e. a proportionate means to achieving a legitimate aim.

Indirect discrimination applies to age, race, religion or belief, gender, gender orientation, and marriage and civil partnership, disability and gender reassignment.

- e) **Harassment** - Harassment is defined as 'unwanted conduct *related* to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. Employees are also protected from harassment because of perception and association i.e. where the conduct is not specific to them but is related to a protected characteristic.

Harassment applies to most protected characteristics, with the exception of pregnancy and maternity, and marriage and civil partnership.

- f) **Third party harassment** - The Act makes an employer potentially liable for harassment of their employees by third parties who are not employees of their organisation, e.g. customers or clients. An employer will only be liable however when harassment has occurred on at least two previous occasions, where they are aware that it has again taken place and have not taken reasonable steps to prevent its repetition.

Third party harassment applies to gender, disability, gender reassignment, race, religion or belief and gender orientation.

- g) **Victimisation** - Victimisation occurs when an employee is treated unfairly because they have made or supported a complainant or raised a grievance, or because they are

suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

There is no requirement to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Public Sector Equality Duty Aims (Specific Duties)

The Act provides a power to make regulations imposing specific duties on the public bodies such as the PFCC to support improved performance of the general duty. The specific duties came into force in September 2011.

They require the PFCC to:

- Publish equality objectives, at intervals of not greater than four years, beginning with the date of the last publication.
- Publish information to demonstrate their compliance with the equality duty, at intervals of not greater than one year, beginning with the date of the last publication.

The equality objectives and information about the delivery of equality must be published in a way which makes it easy for people to access it. The information may be published within another document.

Implementation

As a public body we need to consciously think about the three aims of the Public Sector Equality Duty as part of the process of decision-making. The Duty will be one of a number of factors that need to be considered. The weight given to the Duty, compared to the other factors, will depend on how much that decision affects discrimination, equality of opportunity and good relations and the extent of any negative impacts that need to be addressed.

The following principles, drawn from case law, explain what is essential in order for the Duty to be fulfilled. Public bodies should ensure:

Knowledge – those who exercise the public body's functions need to be aware of the requirements of the Equality Duty. Compliance with the Equality Duty involves a conscious approach and state of mind.

Timeliness – the Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

Real consideration – consideration of the three aims of the Equality Duty must form an integral part of the decision-making process. The Equality Duty is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.

Sufficient information – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.

No delegation – public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.

Review – public bodies must have regard to the aims of the Equality Duty not only when a policy is developed and decided upon, but also when it is implemented and reviewed. The Equality Duty is a continuing duty.

Holding the Chief Officers to the Account

The PFCC also has a statutory duty under the Police Reform and Social Responsibility Act 2011 to hold the Chief Constable to account for the force's obligations under the Equality Act 2010 both in terms of their general and specific duty.

As the Police, Fire and Crime Commissioner Fire and Rescue Authority, the Commissioner also has an important role in holding the Chief Fire Officer to account for their responsibilities under the Act. This is set out within the [Scheme of Delegation within the Police, Fire and Crime Commissioner Fire and Rescue Authority Constitution](#).

What does this mean for the Police, Fire and Crime Commissioner?

The PFCC has a two-fold responsibility:

- to meet the general and specific duties in relation to the PFCC's own functions/policies and staff
- to ensure that the Chief Constable and Chief Fire Officer meet their obligations under the Equality Act, including the general and specific duties

How we will do this?

To support these responsibilities and help achieve the Commissioner's vision of creating safe and secure communities which are the bedrock on which we build success and wellbeing for all, we will:

- Develop, implement and report against our equality objectives
- Undertake Equality Impact Assessment of all key strategic policies, decisions and strategies
- Make relevant information accessible to the public.
- Monitor recruitment and appointment of staff including volunteers
- Monitor and scrutinise Essex Police and Essex County Fire and Rescue Service

Equality Impact Assessments

a) What is an Equality Impact Assessment?

Equality impact assessments are a way of systematically and thoroughly assessing and consulting on the effects a proposed policy, strategy or significant change in process is likely to have on people, depending on their protected characteristics. They can also be used as a

way of estimating the likely equality implications of existing functions or policies on people of different protected groups.

The aim is to improve the way in which we develop functions and policies by making sure that the way that they are designed, developed or delivered does not disproportionately disadvantage any particular protected groups and that, wherever possible, equality is promoted.

Functions are the full range of activities carried out by a public authority to meet its duties while policies define the different ways in which the public authority carries out these duties and powers.

b) The benefits of using equality impact assessments

By implementing the requirements of equality duties and equality analysis the PFCC will benefit from:

- better targeted policies
- representation of different groups at all levels
- improvements in public perception and confidence in our role
- opportunity to identify ways to advance equality and foster good relations
- more informed decision-making
- attracting a more representative workforce
- avoiding losing or undervaluing staff
- improved staff morale and productivity
- avoiding claims of unlawful discrimination, and
- improved customer service and satisfaction

c) When should we undertake an Equality Impact Assessment?

An Equality Impact Assessment should be undertaken when making any decision with different levels of details required if that decision is seen to be relevant to the aims of the general duty.

d) How will we carry out full Equality Impact Assessments?

Comprehensive Equality Impact Assessments should be undertaken on those policies/functions identified as relevant to the aims of the equality duty.

Equality Impact Assessments will be undertaken by the PFCC staff responsible for the relevant function or policy. Advice will be sought from representatives with specialist equality assessment awareness, skills and experience where required.

The form at **Appendix A** should be used to complete the Equality Impact Assessments.

Making relevant information accessible

The PFCC recognises that a critical part of its role is to communicate effectively with local communities. The PFCC is committed to ensuring that there are no barriers preventing any community member from knowing about, finding or accessing information.

To meet this specific duty, the PFCC will:

- ensure that the 'language' of the PFCC's documentation is not biased, with respect to any of the protected characteristics
- find out what information people need or want, monitor how they use this information and obtain feedback
- upon request provide information in a range of formats such as the more common alternative languages, large print, Braille or CD
- consider how information can best be distributed and publicised
- ensure that information is regularly fed back and the public kept informed of the PFCC's work
- ensure that the PFCC's accessible and alternative format statement continues to appear on all publications.

PFCC publications and other specific information can be found by visiting the PFCC's website.

Monitoring recruitment and appointment of staff and volunteers

a) Applicants

The PFCC wishes to understand if policies and practices with respect to the recruitment or selection of staff, including volunteers are fair and attract a range of people from the demographic profile of Essex.

In respect of applicants, the PFCC will monitor:

- Ethnic origin
- Age
- Sex
- Disability
- Faith and belief / or non-faith or belief
- Sexual orientation
- Family status
- Part- or full- time working
- Success rates at different stages in the selection process

b) Monitoring the composition of the Police, Fire and Crime Commissioner's office

Although not strictly required by the legislation, as a matter of good practice, the PFCC will monitor the composition of PFCC staff and volunteers.

c) Recruitment

The PFCC ensures that its recruiting processes are fair and equal. Vacancies for staff and volunteers are advertised on our website and in appropriate newspapers, publications and social media channels. Potential candidates are required to complete an application form and those selected at this stage will be asked to attend a formal interview or an informal discussion for some volunteers / visitors. Success at the final stage should lead to an offer of a post subject to the necessary security checks and references.

Appropriate health related questions will not be asked until after a job offer (conditional or unconditional) has been made with the exception of:

- deciding whether reasonable adjustments to the selection process are required
- deciding whether the applicant can carry out a function essential to the job
- to monitor diversity
- to take positive action to assist disabled people
- ensuring a candidate has the disability when the job genuinely requires this.

The abilities, merits and qualifications of all candidates must be considered in each recruitment exercise. Proportionate steps may be taken to help job applicants or employees overcome their disadvantages or to meet their needs. A protected characteristic may be taken into consideration in respect of recruitment or promotion if candidates are equally capable of undertaking the work. Evidence would be needed to show that people with the characteristic face particular difficulties in the workplace or are under-represented in the workforce or job for which there is a vacancy.

The PFCC is mindful that it is unlawful to prevent or restrict employees from discussions to establish the existence of any differences in pay that are related to protected characteristics, also that a claim of direct pay discrimination may be made, even if no real person comparator can be found.

The PFCC recognises that it is under-represented in certain groups and strives hard to attract applicants from those groups. The PFCC will take positive action to increase applications by advertising directly within the relevant community groups, making use of already available structures such as adverts in community newspapers.

Monitoring Essex Police and Essex County Fire and Rescue Service

The PFCC will monitor Essex Police and Essex County Fire and Rescue Service's compliance to ensure it meets the general and specific duties of the relevant legislation. The PFCC ensures effective processes are in place for the Chief Constable and Chief Fire Officer to report on progress regularly. Reports considered by the PFCC in connection with the exercise of these responsibilities are published on the PFCC website. This scrutiny programme will also be developed as an equality objective as set out above.

Respect for equality and diversity is a key competency for the purposes of Chief Constable and Chief Fire Officer selection. The PFCC also receives reports on other aspects of the services' work that impact upon equality and diversity; examples can be found below:

a) Procurement

The PFCC will ensure, through the Joint Audit Committee with Essex Police, and the Audit Committee for Essex County Fire and Rescue Service, as well as through its membership of the Seven Force Strategic Procurement Governance Board (SPGB), that the procurement procedure is accessible to a variety of firms. Firms who want to work with the PFCC must be able to demonstrate that they meet the general and specific duties under equality legislation, prior to delivering goods or services.

b) Stop and Search

The PFCC recognises that nationally there are some concerns about disproportionality in regard to stop and search. The PFCC will monitor the force's use of stop and search powers and will also attend or be represented by a member of their office at the Strategic Independent Advisory Group where community members also scrutinise the use of stop and search powers.

d) Complaints

The PFCC will monitor complaints made by members of the public on their treatment and will ensure that complaints regarding discriminatory behaviour are dealt with effectively and any lessons learnt are considered by Essex Police and Essex County Fire and Rescue Service.

e) Performance

The PFCC monitors the performance of Essex Police and Essex County Fire and Rescue Service. In respect of equality and diversity the PFCC receives reports from both services and considers items such as parity of user satisfaction.

d) Personnel

The PFCC monitors and reviews both services' workforce strength and diversity data. The PFCC monitors the number of staff/officers employed by the services against position, gender, age, ethnicity, disability and so forth.

How can I find out more information or give feedback on this Equality, Diversity and Inclusion Strategy?

The office of the PFCC is a learning organisation and welcomes feedback to help improve the delivery of functions and services.

If you would like to feedback to the PFCC please visit our website at <http://www.essex.pcc.police.uk/> and click on "Contact Us" or contact the Chief Executive's Office at:

The Chief Executive, Police, Fire and Crime Commissioner for Essex, Kelvedon Park,
London Road, Essex, CM8 3HB

[NOT PROTECTIVELY MARKED]



01245 291600



pfcc@essex.pnn.police.uk

FULL EQUALITY IMPACT ASSESSMENT FORM
Appendix A

Area of Assessment:	
Date of Assessment:	
Owner:	
New or existing policy/function:	
Stage 1 – Detail of policy, function, project or proposal	
Briefly describe the aims, objectives and outcomes of the policy/function	
<p><i>This stage requires a brief description of the aims, objectives and outcomes of the policy/function.</i></p> <p><i>A description of any particular circumstances whereby it may be necessary for discretion to be applied to the policy/function should be considered</i></p>	
What policies/procedures/functions are relevant to this area?	
<p><i>Other policies, procedures or functions of relevance to the area being impact assessed should be listed and taken into consideration.</i></p>	
Stage 2 – Consider the Evidence	
Which individuals and organisations are likely to be affected by the policy/function and in what way?	
<p><i>Any decision as to whether a function or policy is likely to have a differential or adverse impact on the protected groups must be based on evidence.</i></p> <p><i>Consideration should be given to who will be affected by the function/policy and in what way.</i></p>	
What relevant quantitative data has been considered?	
<p><i>Relevant quantitative and qualitative data should also be considered at this stage, which provides an opportunity to demonstrate that consideration has been given to data and information from a wide range of available sources. It is important to clearly indicate where data and information that was considered can be accessed.</i></p>	
What relevant qualitative data has been considered?	
See above	

Has the function/policy been subject to consultation? If no, why not? If yes, which individuals and organisations were consulted and what form did consultation take?

External consultation is an integral part of the full equality analysis process and should be regarded as a process of ongoing dialogue to inform decisions throughout the process. The nature and extent of consultation will be dependent on the area being analysed and the results of the previous stages. Anyone with a legitimate interest in the matter particularly if they may be affected by the function or policy, including those identified during screening, should be consulted. Relevant organisations and stakeholders such as the independent advisory group (IAG) should also be invited to inform the equality analysis.

Consultation should always be timely, open and inclusive and the method employed should suit the subject and the groups involved. It may also be used to corroborate relevance to equality decisions where it is decided that equality analysis will not be required.

Were any gaps in information identified? If so, what consideration has been given to commissioning work where required?

Any gaps in available data and information needs to be identified, but the existence of gaps does not necessarily lead to the commissioning of research. It is also possible that some relevant information may not come to light until the policy is actually implemented

Stage 3- Assessment of impact

		Yes/No	Comments and evidence where appropriate
Potential for differential/ adverse impact based on analysis of data and information	Race		<p><i>The evidence considered at Stage 3 should be used to identify any differential impact and then to make judgement as to whether this amounts to an adverse impact.</i></p> <p><i>Differential impact suggests that a particular protected characteristic group has been affected differently by a policy, in either a positive, neutral or negative way. Adverse Impact is a significant difference in patterns of representation or outcomes between protected groups, with the difference amounting to a detriment for one or more of the protected groups. In some cases differential impact may be justified. Any differential impact which cannot be justified is termed adverse impact.</i></p>
	Disability (Including physical, sensory and mental health)		
	Gender reassignment		
	Age		
	Religion or belief		
	Sexual orientation		
	Pregnancy and maternity		

	Marriage and civil partnership		
	Sex		

Stage 4 – Deciding the way forward

If potential for differential/adverse impact remains explain why implementation is justifiable in order to meet the wider policy aims.

This provides an opportunity to consider changes to the policy to remove or reduce the potential for differential or adverse impact while still delivering the aims of the policy or to explain why a function or policy might need to remain as it is even if the potential for impact has been identified.

Summarise any changes made to the policy to reduce or remove the potential for differential/adverse impact

Options for change include making changes to the policy or the way in which it is to be implemented, considering a different policy altogether which still achieves the aims and objectives of the original proposal but avoids any adverse impact on equality. Before making a decision, checks should be made to ensure that adopting an option that reduces adverse impact on one protected group does not create adverse impact on another protected group. If this is unavoidable, satisfactory justification should be provided.

If the function/policy is to be abandoned, please explain why and how the implications will be managed

If it is discovered during the impact analysis that a function or policy is likely to be unlawfully discriminatory, then it should be immediately abandoned although consideration must be given to the implications of taking this decision. Any new policy that is proposed would then be subject to equality analysis.

Describe how the function/policy promotes good relations

Any decision should explain clearly how the policy was decided, and what its effects and benefits are likely to be.

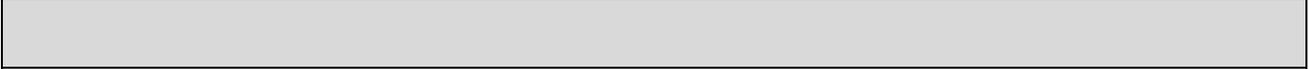
Stage 5 - Monitoring Arrangements

Describe how the function/policy is (or will be) monitored

Monitoring is an important way of measuring the effects of functions and policies in practice. This stage provides the opportunity to set out ongoing arrangements for

monitoring and reviewing the function or policy and its impact e.g. monitoring of complaints or performance indicators such as satisfaction. This may be best put forward as a high level actions plan.

Ongoing monitoring arrangements will be used to determine how functions and policies are affecting different groups with protected characteristics and whether they are having an adverse effect on any protected group.



Have the assessment outcomes been fed back to those consulted?

See above

Impact assessed by:		Date:	
Approved by (owner):		Date:	